

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

COSMOKEY SOLUTIONS GMBH & CO.	)	
KG,	)	
	)	
Plaintiff,	)	C.A. No. 18-1477-JLH
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
DUO SECURITY, INC. n/k/a DUO	)	
SECURITY LLC and CISCO SYSTEMS,	)	
INC.,	)	
	)	
Defendants.	)	

**STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING REVISED SCHEDULING ORDER DATES**

WHEREAS, Defendants' Motion to Dismiss (D.I. 67) remains outstanding and the pleadings are not yet closed as a result;

WHEREAS, the Court has recently issued its Markman opinion (D.I. 169) and the parties may wish to supplement contentions;

WHEREAS, several discovery disputes remain outstanding and are scheduled for oral argument on May 20, 2024 (*see* D.I. 141) and the close of fact discovery is currently set for June 14, 2024 (D.I. 45); and

WHEREAS, the parties have conferred and have agreed to the following adjustments in the case schedule<sup>1</sup>:

IT IS HEREBY STIPULATED AND AGREED by and between the parties and subject to the approval of the Court, that the following deadlines are amended as follows:

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<sup>1</sup> Pursuant to Local Rule 16.4, the undersigned counsel certifies that this stipulation has been sent to counsel's respective clients.

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Deadline to amend pleadings to include inequitable conduct	May 1, 2024	10 days after a ruling on the Motion to Dismiss (D.I. 67) <sup>2</sup>
Hearing regarding outstanding motions to compel	May 20, 2024	No change
Plaintiff to serve supplemental infringement contentions	N/A	May 10, 2024
Deadline for Defendants to serve supplemental invalidity contentions and non-infringement contentions (in response to Interrogatory No. 3)	N/A	June 7, 2024
Close of fact discovery	June 14, 2024	June 28, 2024
Opening expert reports on issues to which a party bears the burden	July 12, 2024	July 26, 2024
Rebuttal expert reports	August 16, 2024	August 30, 2024
Reply expert reports	September 13, 2024	September 27, 2024
Complete expert depositions	October 11, 2024	October 25, 2024
Deadline for case-dispositive and <i>Daubert</i> motions	November 8, 2024	November 29, 2024
Opposition to case-dispositive and <i>Daubert</i> motions	December 4, 2024	January 7, 2025
Reply to case-dispositive and <i>Daubert</i> motions	December 20, 2024	January 21, 2025

<sup>2</sup> Given the pending motion to dismiss, Defendants have agreed to disclose any inequitable conduct theories no later than May 31, 2024. Although Defendants will disclose any inequitable conduct theories at that time, Defendants' agreement does not otherwise alter Defendants' rights and obligations pursuant to the Federal Rules of Civil Procedure, including Federal Rule of Civil Procedure 26. To the extent the pending motion to dismiss remains unresolved and the pleadings remain incomplete as the case approaches the close of fact discovery, the parties will further confer and contact the Court if needed.

Event	Current Deadline	Proposed New Deadline
Joint proposed pretrial order, as well as <i>in limine</i> motions, jury instructions, voir dire, and verdict form	April 30, 2025	No change
Final pretrial/scheduling conference	May 21, 2025	No change
Jury Trial	June 9, 2025	No change

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Dated: April 29, 2024  
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MORRIS, NICHOLS, ARSHT & TUNNELL LLP

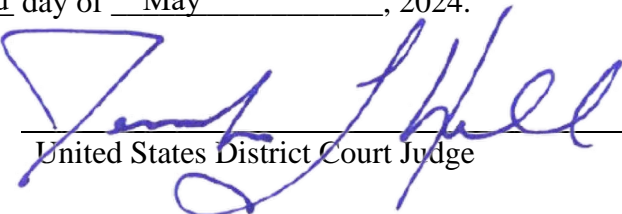
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*Attorneys for Defendants Duo Security LLC f/k/a Duo Security, Inc. and Cisco Systems, Inc.*

SO ORDERED this 2nd day of May, 2024.

  
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United States District Court Judge